

1 Leslie T. Gladstone, Esq. (SBN 144615)
Christin A. Batt, Esq. (SBN 222584)
2 Andrew M. Greene (SBN 167386)
3 FINANCIAL LAW GROUP
4 401 Via Del Norte
La Jolla, CA 92037
Telephone: (858) 454-9887
5 Facsimile: (858) 454-9596
6 AndrewG@flgsd.com

7 Attorneys for Leslie T. Gladstone, Chapter 7 Trustee

8 UNITED STATES BANKRUPTCY COURT
9 SOUTHERN DISTRICT OF CALIFORNIA

10 In re:

11 RHONDA VELASCO,
12 Debtor.

14 LESLIE T. GLADSTONE, CHAPTER 7
15 TRUSTEE,

16 Plaintiff,

17 v.

18 FRANK STEVEN VELASCO,
19 Defendant.

Case No.: 17-02053-LT7

Adv. No.: 18-90040-LT

**STIPULATION TO EXTEND TIME TO
RESPOND TO COMPLAINT**

21 On or about April 4, 2018, Leslie T. Gladstone, the chapter 7 trustee (“**Plaintiff**”), filed a
22 complaint against Frank Steven Velasco (“**Defendant**”) for avoidance and recovery of fraudulent
23 transfer, disallowance of claim, and authority to sell real property. Defendant’s response to the
24 complaint is due on May 4, 2018.

25 The parties have been communicating, and Defendant is investigating the allegations
26 contained in the complaint. Defendant has requested an additional 14 days to respond to the
27 complaint, and Plaintiff agrees to this request.
28

1 Accordingly, the parties have agreed that Defendant's response to the complaint is due no
2 later than May 18, 2018.

3 IT IS SO STIPULATED.

4 Dated: April 24, 2018

FINANCIAL LAW GROUP

By: 

Andrew M. Greene Esq.
Attorneys for Leslie T. Gladstone, Trustee

10 Dated: April 23, 2018

LAW OFFICES OF BRUNO FLORES, APC

By: 

Bruno Flores, Esq.
Attorney for Defendants

PROOF OF SERVICE

I, Sandra Young, hereby declare as follows:

I am employed in the City of La Jolla, County of San Diego, California. I am over the age of 18 years and not a party to the within action; and I am employed in the County of San Diego, California, within which county the subject mailing occurred. My business address is 401 Via Del Norte, La Jolla, California 92037. On **APRIL 24, 2018**, I served a true and correct copy of the following document(s):

STIPULATION TO EXTEND TIME TO RESPOND TO COMPLAINT

on the parties in this action as follows:

X **by CM/ECF NOTICE OF ELECTRONIC FILING** by causing such document(s) listed above to be served through this Court's electronic transmission facilities via the Notice of Electronic (NEF) and hyperlink, to the parties and/or counsel who are determined this date, APRIL 24, 2018, to be registered CM/ECF Users set forth below as identified on the service list obtained from this Court on the Electronic Mail Notice list.

- Leslie T. Gladstone, Chapter 7 Trustee, candic@flgsd.com, candic@flgsd.com; christinb@flgsd.com; sandray@flgsd.com; ltg@trustesolutions.net; andrewg@flgsd.com
- Andrew Greene, Attorney for Chapter 7 Trustee, andrewg@flgsd.com, leslieg@flgsd.com; christinb@flgsd.com; candic@flgsd.com; sandray@flgsd.com

All other interested parties in this action that are not a registered ECF User are served as follows:

X **by U.S. FIRST CLASS MAIL SERVICE, POSTAGE PREPAID** by placing each document in a sealed, envelope with postage thereon fully prepaid, for collection and mailing at Financial Law Group, La Jolla, California, following ordinary business practices and addressed as set forth below. I am familiar with the practice of Financial Law Group for collection for U.S. mail, said practice being that in the ordinary course of business, correspondence is picked up at our office the same day as it is placed for collection. I am aware that on motion of the party served, service is presumed invalid if postal cancellation date or postage meter date is more than one day after date of deposit for mailing affidavit.

Frank Steven Velasco
29583 Silver Buckle Court
Highland, CA 92346
Defendant

Bruno Flores, Esq.
Law Offices of Bruno Flores
3133 Tiger Run Ct., Ste 107
Carlsbad, CA 92010-6704
Attorney for Defendant

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

Executed April 24, 2018, at La Jolla, California.

/s/ Sandra Young
Sandra Young